Corporate Waste Management Policy— Disposition and Reclamation of Inventory and Fixed Assets

DOCUMENT IDENTIFIER: A-DG-ELCP758-02-0000 Rev B, 23-Oct-1992

ABSTRACT: This document establishes a uniform policy to manage, control, and account for inventory and fixed assets intended for disposition or reclamation.

APPLICABILITY: This policy applies worldwide. International disposition procedures may vary from those presented because of country regulations and organizational differences.

STATUS: APPROVED 23-Oct-1992; use VTX SMC for current status.

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1 OBJECTIVE

The objective of this standard is to establish a uniform policy to manage, control, and account for inventory and fixed assets intended for final disposition or reclamation. Also, the goal of this document is to establish the minimum standards of business controls by defining procedures to assure:

- Security of material from unauthorized personnel, third parties, and competitors
- Compliance with applicable laws and regulations
- Proper management and accounting controls
- Disposition in an environmentally sound manner

2 SCOPE

This policy applies worldwide. International disposition procedures may vary from those presented here due to country regulations and organizational differences.

This policy covers inventory, development and production equipment, furniture and office equipment, software and computer assets, facility and other miscellaneous assets; buildings and land are specifically excluded.

3 POLICY

Digital's policy regarding the disposition and reclamation of inventory and fixed assets is detailed in this head.

a. Digital organizations will attempt to manage the disposition and reclamation of inventory and fixed assets in accordance with the established Principles of Waste Management. Refer to EL-CP758-00, *Corporate Waste Management Policy—Principles of Waste Management*.

b. Areas and countries are expected to establish methodologies for disposition and reclamation that consider the following hierarchy in order to maximize the objectives of this policy.

   1. Transfer internally
   2. Trade in or sell back to original supplier
   3. Establish strategic partnerships
   4. Resell to other companies
   5. Recycle material
   6. Reclaim reusable materials
   7. Treat to reduce volume or hazard
   8. Dispose of residual

c. Areas and countries are responsible for managing, controlling and accounting for inventory and fixed assets intended for disposition and reclamation by establishing appropriate processes and required procedures.

d. Areas and countries may, if warranted by business conditions or regulatory requirements, establish a Property Disposition Center (PDC) or similar function owned by Digital internationally, or purchase disposition services (either reclamation or disposal) from qualified companies.

   - The PDC, or similar function internationally, disposes of all equipment to qualified disposal companies outside of Digital. Disposal includes reuse, recycle, and reclamation, and sale *as is*, consignment, or sale as scrap.
   - The Corporate Waste Management group is available for advice, guidance, and support to business managers prior to the decision to establish a PDC owned by Digital to ensure that Corporate Waste Management objectives are being met.

e. The process and procedures established by the area or country shall incorporate the business controls described in head 4 of this policy, for disposition services provided either by a PDC owned by Digital, or similar function internationally, or purchased from a qualified disposal company. Areas are responsible for approving and documenting deviations from these business controls.

f. Areas, countries, and PDCs (including similar functions internationally) will comply with all local, country, and international regulations governing the movement and disposition of hazardous and nonhazardous materials and wastes.

4 PROCEDURE

The following procedures are the minimum standards of business controls to be implemented by the areas and countries. Deviations may be approved by area management; however, deviations must provide an equal or higher degree of business control.

4.1 ESTABLISHMENT OF PROPERTY DISPOSITION CENTERS

Digital's policy regarding the establishment of property disposition centers is described in this subhead.

a. Areas and countries are to analyze their needs, considering the following criteria.

   - Volume and type of material to be disposed of.
   - Site capabilities (square feet available, fit-up cost, operating and processing costs, human resource availability, shipping and receiving capacity, special capital equipment, and so on).
   - Distribution costs and pattern (country borders, duties, and so on)
   - Security (complete destruction and control of material)
   - Environmental requirements and restrictions
   - Local or country governmental regulations (permitting requirements, approval lead time)
   - Disposition company availability, qualifications, and cost (recycling capability, hazardous or nonhazardous landfill sites and capacity)
   - Long-term liabilities to Digital (defined and potential)
   - Income to Digital from reclamation versus cost of disposition

b. PDCs, or similar functions internationally, will provide for the appropriate security of Digital's product, logo, and image through the establishment of proper controls as outlined in head 4 of this standard.

c. All companies used for disposition of Digital material, including, but not limited to, disassembly, transportation, reclamation, recycling, and disposal, must be qualified through a process established by area or country management, with the exception of buyers of nonproprietary materials that are being sold through auction or cash sales.

   - Qualification must be supported in writing. The *Supplier/Broker Selection and Qualification Survey Form* has been developed by Corporate Waste Management for use by areas and countries to assure a minimum review of disposal companies. This form is available for viewing or printing by accessing the VTX WASTE application. Type VTX WASTE for instructions.
   - Qualification must be in accordance with *Purchasing Policies and Procedures Manual*, Section 4, Supplier Relations.

d. An agreement with appropriate terms and conditions must be established with all companies used for disposition of Digital material.

   Terms and Conditions must include, as a minimum, provisions for disclaimer, security, environmental health and safety, warranty, denied parties, unauthorized sale or use, requirements for Certificate of Destruction, and any other provisions deemed appropriate by Digital's local Law Department.

4.2 TRANSFER TO AND FROM PROPERTY DISPOSITION CENTERS

Digital's policy regarding the transfer of assets to and from PDCs is described in this subhead.

a. Surplus or obsolete inventory and fixed assets must be listed on the Digital Idle Asset Listing (DIAL) for a period of 60 calendar days for inventory and 90 calendar days for capitalized fixed assets. For guidance and exceptions, refer to the *Corporate Accounting and Reporting Manual*, Disposition of Property, Plant and Equipment, and Disposition of Excess/Obsolete Inventory, Policies 304-04 and 301-18. Subsequently, the material can be disposed of by a PDC, similar function internationally, or qualified disposal company.

b. Damaged inventory or fixed assets, prototype and technically obsolete material that is to be disposed of, will be shipped to the PDC, a similar function internationally, or qualified disposal company, nearest their location. It does not need to be listed on DIAL prior to shipment.

c. Locations identifying idle, surplus, or obsolete production equipment will provide notification three months prior to the date equipment will be available to the Key Resource Person or person responsible for purchasing that commodity in each area or country. If that person is unable to transfer the equipment internally or to the original supplier, the PDC, a similar function internationally, or a qualified disposal company, will be notified for disposition.

d. Locations planning to ship idle, surplus, or obsolete inventory and equipment to a PDC, similar function internationally, or qualified disposal company, must give notice of intent to ship the equipment. This requirement may be waived by the receiver.

e. Material shipped to a PDC, similar function internationally, or qualified disposal company, must be accompanied by both of the following.

- A completed and authorized *Shipping and Billing Authorization Form* (SBA)
- An approved write-off or transfer document, such as:

  Inventory Write-Off Form (EN-03561-03)
  Material Requisition From Stockroom #_ __ _ Form (EN-01018-01)
  Request for Capital Write-Off Form (EN-02292-01)
  Transfer of Capital Equipment Form (EN-02298-01)

f. All material to be disposed of to the PDC, similar function internationally, or qualified disposal company, must be shipped in containers that are sealed in such a manner as to indicate any attempts at unauthorized entry or pilferage or shipped in transport trailers with serialized seals or locks.

For High Value/High Risk material, as determined by the shipping site, the material must be listed on the SBA with the notation "Proprietary". If the material has been rendered unusable at the site prior to shipping, then the notation of "Proprietary" is not required.

g. Material will be shipped according to local Digital Routing Guides, which vary geographically.

h. PDCs, similar functions internationally, and qualified disposal companies must implement a documented process that provides for acknowledgment, incoming inspection, and reconciliation for shipments received.

This process must include provisions for specific verification of high value, proprietary, and option level materials and parts. All discrepancies that are not satisfactorily resolved must be reported to area Security. Refer to *Corporate Security Standard 2.5, Disposition of Scrap and Salvageable Materials*.

i. Digital personnel and qualified disposal companies operating on Digital's behalf will comply with local, national, and international regulatory agencies, and import/export regulations.

j. Personnel with shipping and receiving responsibilities shall be adequately trained in the shipping and handling of hazardous material and will ship such material in accordance with EL-CP534-00, *Digital Hazardous Material/Dangerous Goods Policy*.

k. Hazardous materials and waste will not be shipped to the PDC, similar function internationally, or qualified disposal company, unless they have received the appropriate regulatory permits. Consult area Environmental Health and Safety (EH&S) prior to sending questionable materials.

4.3 STORAGE OF MATERIALS INTENDED FOR RECLAMATION OR DISPOSAL

Digital's policy regarding the storage of materials intended for reclamation or disposal is described in this subhead.

a. Material awaiting disposition will be stored in a secure location to prohibit unauthorized access.

b. Hazardous materials will be separated physically, controlled, and labeled according to applicable regulations. Each hazardous material will be stored separately with controls in place to prevent spills and to protect employee health and safety. Contact area and site EH&S for assistance and specific directions.

c. All PDCs, or similar functions internationally, will establish physical inventory and cycle counting processes. Inventory variances that are not satisfactorily resolved will be escalated to the appropriate controllers and Security for resolution.

4.4 DISASSEMBLY AND DESTRUCTION OF PRODUCTS AND MATERIALS

Digital's policy regarding the disassembly and destruction of products and materials intended for reclamation or disposal is described in this subhead.

a. Before being released to a company for reclamation or disposal, all materials must be sorted and segregated to ensure that all hazardous materials are removed, physically separated from nonregulated material, and properly disposed of. The materials designated for reclamation must be sorted by commodity. A listing of those components that contain hazardous materials has been compiled by Corporate EH&S.

EXCEPTION

An approved waste management program wherein the qualified disposal company agrees by contract to sort and segregate the material prior to reclamation or disposal is an exception to this policy.

b. All disassembly processes must be developed in compliance with the applicable laws and best practices concerning hazardous materials and solid waste.

c. All Digital employees performing disassembly work must be properly trained according to applicable laws and regulations in the handling of hazardous material, hazardous waste, recovery of precious metals, and the handling of classified information or product.

d. All computer material received at the PDC, or similar function internationally, is to be sold as scrap and must be rendered completely unusable, such as by shredding or crushing, prior to leaving Digital premises or through the secure transportation to a qualified disposal company for destruction with Digital personnel present. Where the above requirements cannot be met, area Security must document the alternative security process implemented and ensure it meets the highest level of security possible for the level of business risk and circumstances involved.

EXCEPTION

Scrap computer equipment or components that are still usable (functional) must not be sold by the PDC, or similar function internationally, to any company for their use or resale without written approval of the Manager of the Corporate Waste Management group. A listing of products and components that can be sold is maintained by the Corporate Waste Management group.

e. Prior to the sale of usable components, inventory, or fixed assets by the PDC, or similar function internationally, to a qualified disposal company for the purpose of resale, all visible Digital logos must be removed, defaced, or destroyed. All Digital logos that are removed must be completely destroyed, such as by shredding.

f. All processes and methods of destruction must be reviewed and approved by area Security and area EH&S. For the external destruction of proprietary equipment, the following requirements must be in place.

- The company must be prequalified to destroy the equipment.
- The company is required to certify that all Digital logos were removed, defaced, or destroyed, and that the equipment was destroyed. A Certificate of Destruction (form) must be provided.
- The material must be transported and destroyed with Digital personnel present or with an appropriate security process in place.

g. Complete disposition records must be in place and maintained by the PDC, or similar function internationally, or by the qualified disposal company. Disposition of material to qualified companies must be identified by an SBA that contains the type of equipment, weight, and the scrap dollar value, if predetermined. If the scrap dollar value is not predetermined, an audit trail of the sale as scrap, including dollar value, must be maintained. The record retention requirements for documents for nonhazardous materials is seven years; records for hazardous materials must be retained permanently.

h. All materials within the disposition process must be properly secured throughout the entire cycle, from receipt at the PDC, or similar function internationally, or qualified disposal company, through final disposal and reclamation. This applies especially to precious metals, boards, modules, chips, and so on.

i. Direct local sales of scrap, inventory, and fixed assets to companies qualified by the PDC or similar function internationally, can be made only under direction of the manager of the PDC, or similar function internationally.

j. Material received at a PDC, or similar function internationally, or qualified disposal company, must never be returned to manufacturing or any other operating unit to be used as new product that results in revenue to Digital, unless specifically approved in writing by the Manager of Corporate Waste Management. Digital Services may salvage components and parts for use in repair operations.

k. Capital equipment received at the PDC, or similar function internationally, may be recapitalized for use within Digital according to the guidelines in the *Corporate Accounting and Reporting Manual*, Policy 304-04.

4.5 RECLAMATION, RECYCLING AND DISPOSAL

Digital's policy regarding the reclamation, recycling and disposal of inventory and fixed assets is described in this subhead.

a. All companies contracted for reclamation, recycling, or disposal, will comply with all governmental and EH&S regulations applicable in the country, state, and local area in which they operate.

b. Agreements with companies contracted for reclamation, recycling, or disposal will include a clearly documented process for establishing values for scrap.

c. Hazardous material content will be determined prior to disposition of the first article.

d. Hazardous materials to be recycled, reclaimed, or disposed of must be packaged and transported according to applicable Digital standards, EL-CP534-00, and international, country, and local hazardous waste regulations.

e. Income derived from reclamation, recycling, and disposal activities is to be recorded according to guidelines in the *Corporate Accounting and Reporting Manual*, Policy 305-02.

4.6 SALE OF ASSETS

Digital's policy regarding the sale of assets is described in this subhead.

a. The PDC, or similar function internationally, may dispose of assets to maximize the return of Digital. The following are the highest levels of sales activity that can be employed unless specific exceptions are granted by area Management and Corporate Waste Management.

Type of Asset	Manufacturer	Highest Level of Sales Activity
Computer equipment, components, subassemblies, prototypes	Digital or other	May be disassembled, rendered unusable, and sold to reclaim materials. May be provided to Digital Services for repair program. May be transferred to a Digital business to sell as *used* under an approved sales program.
Manufacturing process, development, and test equipment	Built by vendor (generic)	May be sold on an *as is* basis.
	Built by vendor to Digital's specifications or built by Digital	If similar gear is available in the marketplace and if competition will not receive a unique advantage, then it may be sold on an *as is* basis. Digital proprietary software cannot be sold with the equipment and must be removed. Software required to make equipment functional may be sold with approval by Corporate or area Waste Management.
Software	Digital or other	May be rendered unusable and sold to reclaim materials.
Furniture and office equipment	Built by vendor	May be sold on an *as is* basis.
Building equipment (for example, air conditioning, cafeteria equipment)	Built by vendor	May be sold on an *as is* basis

b. The manager of the PDC, or similar function internationally, is responsible for making the appropriate determination, and should seek advice of the Key Resource Person or Commodity Manager, if necessary, in making that determination.

4.7 SALES TO EMPLOYEES

Used computer equipment, furniture, and office equipment may be sold to employees in accordance with the requirements established in the *Corporate Accounting and Reporting Manual*, Policy 301-06.

4.8 CHARITABLE DONATIONS

Digital's policy regarding the donation of excess inventory to charitable organizations is described in this subhead.

a. Requests from charitable or not-for-profit groups for donations of obsolete, damaged, or scrap inventory or equipment may be directed to the PDC Manager, or similar function internationally, or managed by the local sites.

b. The PDC Manager may donate used equipment to charitable or not-for-profit groups in accordance with the PDC's documented procedures, and will obtain approval by the Corporate Contributions Committee where required.

c. Donations of used equipment may be made by employees at the local site level with the approval of the site cost center manager per the *Corporate Accounting and Reporting Manual*, Policy 301-22.

d. Transportation is the responsibility of the recipient. The recipient must agree to have donated equipment checked and accepted by Digital Services. If the recipient chooses not to do this, a disclaimer must be signed holding Digital not responsible for any damages that may result from the uninspected donated equipment. The donated equipment carries no warranty.

e. Requests from charitable or not-for-profit groups for donations of new equipment must be directed to the Corporate Contributions Administrator for review and submission to the Corporate Contributions Committee. Reference the *Corporate Accounting and Reporting Manual*, Policy 301-22.

f. European and GIA subsidiaries must direct requests for new and used equipment to the Subsidiary and area Contributions Committees as appropriate.

4.9 SALES TO CUSTOMERS

Equipment built by Digital and capitalized as rental equipment may be sold as used equipment to the original customer renting the equipment. Refer to the *Corporate Accounting and Reporting Manual*, Policy 304-04, for guidelines.

4.10 SOFTWARE DISPOSITION AND DOCUMENTATION

Digital's policy regarding the disposition of software is described in this subhead.

a. Software engineered by Digital (binaries and documentation) will be dispositioned in a manner similar to materials.

   - Software will always be rendered unusable prior to disposal.

- Requirements to list on DIAL do not apply.

b. Software acquired for internal use or for resale to customers is governed by license agreements between Digital and third-party suppliers. These agreements specify the terms under which software may be transferred to another user. The group or individuals using the software are responsible for:

   - Verifying the license mobility through contact with the software acquisition organization aligned with the business.
   - Paying transfer fees, if any, to the software licenser. Disposition of this software by Digital must comply with license terms and conditions.
   - Ensuring that the software is disposed of by rendering it unusable in accordance with these terms.
   - Ensuring that any remaining financial obligations associated with the software disposed of are canceled through the appropriate Purchasing organization.
   - Providing the appropriate certificate of destruction in accordance with these terms.

5 RESPONSIBILITIES

The following subheads cover the responsiblities of the various groups involved in the disposition and reclamation of inventory and fixed assets.

5.1 CORPORATE WASTE MANAGEMENT

Corporate Waste Management will:

- Establish a uniform global policy to manage disposition and reclamation of inventory and fixed assets.
- Provide guidance and support for decisions by area and country management to establish a PDC owned by Digital.
- Review decisions by area and country to establish a PDC owned by Digital.
- Approve sale by the PDC, or similar function internationally, of usable (functional) scrap computer equipment and components for use or resale by external companies.
- Review worldwide practices for disposition of fixed assets and inventory as defined in this policy.

5.2 CORPORATE SOFTWARE ACQUISITION RESOURCES

Corporate Software Acquisition Resources will establish a software disposition policy.

5.3 CORPORATE ENVIRONMENTAL HEALTH AND SAFETY

Corporate Environmental Health and Safety (EH&S) will maintain a listing of components containing hazardous materials.

5.4 AREA, SUBSIDIARY, AND COUNTRY MANAGEMENT TEAMS

The management teams for area, subsidiary, and country will:

- Manage, control and account for inventory and fixed assets intended for disposition or reclamation.
- Establish a PDC, or similar function internationally, if warranted by business conditions.
- Establish and implement area procedures that support this policy.

5.5 PROPERTY DISPOSITION CENTER MANAGER OR MANAGER OF SIMILAR FUNCTION INTERNATIONALLY

This manager will ensure that:

- Affected personnel comply with this policy.
- Local procedures comply with this policy.
- Required training is provided to employees.
- Companies contracted to disassemble, transport, reclaim, and dispose of scrap material have been properly qualified.
- Reconciliation between sites and fiscal inventory of assets are appropriately conducted.
- Any organization using the services of a PDC understands the roles and responsibilities of both parties.

GLOSSARY

dispose: To get rid of waste in a nonbeneficial manner, for example, to bury in the ground.

excess inventory: Material on hand, whose projected usage requirements exceed the parameters set for each function. The category includes all inventory with any probability of future use, both hardware and software.

hazardous (material/components/waste): The quality of any material, component, or waste posing a potential risk due to its material content characteristics or otherwise defined by Digital's Environmental Health and Safety (EH&S) Policy or by local or country regulations.

high-value material: Parts or material with one of the following attributes:

a. High or critical technology contained in or used in the manufacture of the hardware and software parts or material.

b. High demand in the secondary market.

Key Resource Person: An individual selected to support the Digital Idle Asset Lising (DIAL) disposition process within his or her commodities in the area of asset usage and in the disposition of idle, surplus, or obsolete equipment, whether built by Digital or by a vendor. The Key Resource Person is usually the Commodity Purchasing Manager responsible for that class of assets. The Key Resource Person, in conjunction with the manager of DIAL, may allow exemptions to the 90-day DIAL requirement for fixed assets, and advises the site coordinators as to appropriate action to be taken after equipment has been listed on DIAL for the required period. The list of Key Resource Persons is maintained by the DIAL organization.

obsolete inventory: Usable inventory with no corporate-wide usage requirements due to ECOs or product phaseouts. This includes both hardware and software.

obsolete fixed assets: Nonproductive fixed assets that cannot be transferred to another cost center, traded in, or sold.

Property Disposition Center (PDC) or similar function internationally: A Digital operating group chartered to dispose of and destroy proprietary material and assets owned by Digital in the most economically feasible manner, while protecting the Corporation's image in the marketplace. All worldwide dispositions of excess, obsolete, and scrap inventory and obsolete fixed assets must be authorized by the Property Disposition Manager or similar function internationally.

qualified disposal company: A company that meets the criteria established by area, country, and subsidiary management for the disposal of Digital's scrap materials.

recycle: To return waste material to its original state.

reclaim: To extract out reusable material from waste for use in another process.

scrap: Inventory or fixed assets that have been damaged or deemed to be beyond economic refurbishment or repair by Quality Control; or residual material from the manufacturing process; or unusable material from the disassembly process at a PDC.

treat: To reduce the volume or hazard of waste.

waste: A product, asset, facility, or process material or discharge that has no apparent productive use to Digital in its present form.

APPENDIX A REFERENCED DOCUMENTS

A.1 Digital Documents, EL-Class

EL-Class Number	Document Title
EL-CP534-00	*Hazardous Materials/Dangerous Goods Policies and Procedures Manual*
EL-CP758-00	*Corporate Waste Management Policy—Principles of Waste Management*

A.2 Digital Documents, Other Than EL-Class

Document Number	Document Title
301-06	*Corporate Accounting and Reporting Manual—Sales to Employees*
301-18	*Corporate Accounting and Reporting Manual—Disposition of Excess, Obsolete, and Scrap Inventory*
301-22	*Corporate Accounting and Reporting Manual—Charitable Contributions*
304-04	*Corporate Accounting and Reporting Manual—Disposition of Property, Plant, and Equipment*
305-02	*Corporate Accounting and Reporting Manual—Other Income and Expense*
EN-01018-01	*Material Requisition From Stockroom #_ _ _ _*
EN-01137-01	*Shipping and Billing Authorization Form*
EN-02292-01	*Request for Capital Write-Off Form*
EN-02298-01	*Transfer of Capital Equipment Form*
EN-03561-03	*Inventory Write-Off Form*
	Corporate Purchasing Policies and Procedures Manual
	Supplier/Broker Selection and Qualification Survey Form
	Corporate Security Standard 2.5, Disposition of Scrap and Salvageable Materials

A.3 Ordering Information

The Corporate Security Standard is available on VTX. Type VTX SECURITY_POLICY.

The Corporate Accounting and Reporting Manual is available on VTX. Type VTX CORPFIN.

EN forms are available from Publishing and Circulation Services at DTN 234-4325 or by electronic mail at NEST::ORDER.

The *Corporate Purchasing Policies and Procedures Manual* is available on VTX. Type VTX PVTX.

The Supplier/Broker Selection and Qualification Survey Form is available on VTX. Type VTX WASTE.

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